

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

**SHIRLEY BROWN**, Individually and  
as the Administratrix of the Estate of  
Rodney Brown

**Plaintiff,**

**v.**

**MICHAEL CHAPMAN, et al.,**

**Defendants.**

**Case No. 1:11 CV 01370**

**JUDGE CHRISTOPHER A. BOYKO**

**Proposed Stipulation of Fact**

Plaintiffs and Defendants agree to the following Facts:

1. The plaintiff in this case is Shirley Brown, mother of Rodney Brown and administrator of his estate.
2. The Defendants in this case are Michael Chapman, Belal Ilain, Erik Melendez, John Sattler, James Merritt, Richard Rusnak, and the City of Cleveland.
3. The parties agree to the authenticity and admissibility of the records of the Cuyahoga County Coroner's office related to the autopsy of Rodney Brown, Plaintiff's exhibit 9, as well as the photos related to the this case from the Coroner's office, but reserve the right to object based on potential duplicative evidence.

Respectfully Submitted,

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